03/23/2004 01:31 PM

To: Cohen Barry LE US <barry.cohen@cibasc.com>

cc: "Bradley Margaret (E-mail)" <mbradley@doa.state.ri.us>, Mcnabb

Robert BC US <robert.mcnabb@cibasc.com>

Subject: Re: Ciba request to drop SW-130 from the Groundwater Sampling

Program

Hi Barry,

In my last e-mail to you I neglected to respond to your request to drop monitoring well SW-130 from the sampling program. As you outline in your request, SW-130 is no longer providing groundwater samples and historical data indicates a long history of non detects in the 1-5 ppb range with a few low ppb hits for some constituents. Since this is an in-river well and would most likely not be needed to verify site groundwater quality, I APPROVE your request to drop SW-130 from the sampling program.

If you have any questions please call me at (617) 918-1362.

Frank Battaglia



03/09/2004 05:05 PM

To: Cohen Barry LE US <barry.cohen@cibasc.com>

cc: "Bradley Margaret (E-mail)" <mbradley@doa.state.ri.us>, Mcnabb

Robert BC US <robert.mcnabb@cibasc.com>

Subject: Re: Ciba request to modify the Semiannual Groundwater Sampling

Progra m

Hi Barry,

I have reviewed the attached request for modification of the semiannual ground water sampling program in conjunction with the October 2003 semiannual monitoring report received in December 2003 and APPROVE your request for an annual ground water sampling program. I believe that since we are tracking progress toward meeting cleanup objectives and the contaminant levels are declining and there are no users of the ground water, an annual sampling frequency is appropriate at this time. Annual sampling should now be conducted during the seasonally low ground water flow period around September/October. In the future, once the cleanup objectives appear to be met, we may want to consider changing to a more frequent sampling program to verify there are no seasonal fluctuations in contaminant levels prior to final system shutdown.

The delay in this response is due to the need on my part to review some ground water sampling results that were taken after the soil vapor extraction system (SVE) was shut down in January 2003. I needed to verify that there was no significant increase in contaminant levels after SVE shutdown before I could approve a less frequent sampling program.

If you have any questions please call me at (617) 918-1362.

Frank Battaglia

Cohen Barry LE US <barry.cohen@cibasc.com>



Cohen Barry LE US <barry.cohen@cibasc .com>

10/10/2003 11:17 AM

To: Frank Battaglia/R1/USEPA/US@EPA

CC:

Subject: Ciba request to modify the Semiannual Groundwater Sampling Progra

m

Hi Frank.

Ciba has completed the latest GW sampling (October 2003) at the Cranston facility and results are pending. In reporting the last results (submitted July 15, 2003) for the sampling performed in April 2003, I requested that the EPA consider changing the frequency of sampling from twice per year to once per year. I have not heard anything from you on this request. I have attached a copy of the request and would appreciate if you could review the request and get back to me at your convenience. If you have any questions please let me know. Thanks and regards, Barry



Cranston request to reduce semiannual sampling.ZIP

09/25/2003 05:14 PM

To: Mcnabb Robert BC US <robert.mcnabb@cibasc.com>

cc: Cohen Barry BC US <barry.cohen@cibasc.com>, Tucker John BC US

<john.tucker@cibasc.com>

Subject: Re: SVE Shutdown and Sampling Plan-EPA Approval with

modifications 3

September 25, 2003,

Bob, I have reviewed the SVE shutdown and sampling plan dated 5/9/03 and **approve** of the plan with a few modifications. First, I believe you should locate and sample an eighth boring between VE-2R and VE-3R; second you should sample during the seasonally low groundwater period; and third you should record the depths of each sample taken and compare the results with previous data. In addition, **EPA approves** the removal of all SVE/Thermal Oxidizer equipment and abandonment of the SVE wells. Please be reminded that all work should be conducted using EPA approved methods and proper well abandonment procedures per all applicable federal, state and local regulations. If you have any questions, please contact me at (617) 918-1362.

Sincerely,

Frank Battaglia, RCRA Facility Manager

07/09/2002 04:38 PM

To: Cohen Barry BC US <barry.cohen@cibasc.com>

cc: Dupuis Kenneth BC US <kenneth.dupuis@cibasc.com>, "Bradley Margaret (E-mail)" <mbradley@doa.state.ri.us>, Mcnabb Robert BC US

<robert.mcnabb@cibasc.com>
Subject: Re: Warwick Property Well Closure

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Barry, closure of all wells is OK with EPA.

Frank

Cohen Barry BC US <barry.cohen@cibasc.com>



Cohen Barry BC US <barry.cohen@cibasc.com>

07/08/02 09:31 AM

To: Frank Battaglia/R1/USEPA/US@EPA

cc: "Bradley Margaret (E-mail)" <mbradley@doa.state.ri.us>, Dupuis Kenneth BC US <kenneth.dupuis@cibasc.com>, Mcnabb Robert BC US <robert.mcnabb@cibasc.com>

Subject: Warwick Property Well Closure

Frank,

To accommodate the transfer of the Warwick property we originally planned to close 12 wells (with EPA and RIDEM approval) located on the property that would be consumed in the future construction at the Site. An additional 13 wells were to be left "as is" since they were not in the way of construction. However, Herff Jones has requested, and Ciba is in agreement, that not only the 12 wells in the way of construction, but also the remaining 13 wells that are on the property be properly closed.

Therefore, Ciba agrees that all 25 wells are no longer necessary and proper closure is in the best interest of both party's. As in the past, Ciba is providing this new information to the EPA and RIDEM for your information and comment.

The listed wells for closure are included for your review.

The closing of these wells will not take place until after the final sale/closing on the property takes place. The final sale or property closing will most likely take place anytime between July 15 and August 1, 2002.

ORIGINAL WELLS TO BE CLOSED FIRST

EP-5

EP-7

MW-32S

MW-17S

MW-17D

P22S

P22D

MW-28S

P16S

P17S

P26S-

P26D

ADDITIONAL WELLS TO BE CLOSED AFTER THE FIRST 12 WELLS ARE CLOSED

P15S P27D P21S P21D MW27S P10S EP6 MW26S MW11S MW11D MW6S P18D RW3

If the EPA or RIDEM has any concerns please let me know.

Regards, Barry Cohen